

BERNADETTE SPALDING,  
Plaintiff

vs.

MARY E. SPALDING and  
JACK CARTER SPALDING  
Defendants

No. 14436 Equity  
IN THE CIRCUIT COURT

FOR FREDERICK COUNTY

TO THE HONORABLE, THE JUDGES OF SAID COURT:-

The Petition of Bernadette Spalding respectfully re-  
presents unto your Honors:-

1st: That Martin J. Spalding departed this life on the 13th day of December 1938, intestate; that the said Martin J. Spalding was in his lifetime, seized and possessed of two (2) lots or parcels of ground in Frederick County, State of Maryland, at or near the Southernmost edge of the Town of Emmitsburg, and designated as lots numbered twenty-four (24) and fifty-seven (57) on a Plat marked "Annan, Horner and Company Development", prepared by Emory C. Crum, Civil Engineer, bearing date June 5th, 1922, recorded in Plat Book S.T.H. Folio 136, one of the Land Records of Frederick County, and as shown on an amended plat of the same name, bearing date December 5th, 1924, and recorded in Plat Book S.T.H., Folio 172, one of the Land Records of Frederick County. Said original Deed being filed herewith, marked Plaintiff's Exhibit #1 and prayed to be taken as a part hereof.

2nd: That the said Martin J. Spalding left surviving him as his only heirs at law and next of kin, the following:-

A; Your Oratrix, Bernadette Spalding, his widow.

B: Clarence E. Spalding, a son, who has since intermarried with Marion E. Spalding.

C: J. Edgar Spalding, a son; the said J. Edgar Spalding departed this life intestate on or about the 28th day of March 1940, leaving surviving him his widow, Mary E. Spalding and a son, Jack Carter Spalding as his only heirs at law and next of kin, both of whom are parties defendant herein.